

CODE OF CONDUCT

**BUSINESS PRINCIPLES FOR EMPLOYEES OF
HÄLSSSEN & LYON**



Hälssen & Lyon
est. 1879

THE WORLD OF TEA UNDER ONE ROOF

CONTENT

I. Introduction	3
II. Proper conduct in business matters	3
III. Responsible treatment of the environment – ecological responsibility	7
IV. Compliance with and monitoring of the code of conduct	8
V. Review of the conduct	8
VI. Contact	9

I. INTRODUCTION

Lasting success has many factors. In addition to the high quality of our products and services, one of the most important factors is the trust that Hälssen & Lyon has enjoyed among clients and business partners and among the public for decades. Our common task is to earn this trust time and time again. The basis for this is an ethically impeccable, responsible and law-abiding conduct.

In this spirit, the business principles are intended to help clarify particularly important expectations that are placed on all employees working in our company. On this basis, we as a company want to make sure that we always act with integrity and responsibility in business matters.

This Code of Conduct does not contain any new rules, but illustrates the requirements for our conduct in fulfilling our tasks. Under it, the employees have an obligation exclusively to the company and not to individuals - such as their superiors. Compliance with the laws and regulations of all countries where we operate is an absolute priority for us. We must never do or omit anything if it would lead to an infringement of the law.

The requirements described here therefore form the basis of all business relationships and apply to all Hälssen & Lyon employees. As far as rules of conduct for individual areas of activity are laid down in separate guidelines, these guidelines apply without restriction alongside the Code of Conduct. On top of that, the guidelines must be interpreted in accordance within these business principles. In case of doubt, the more specific rule in each case must be followed.

II. PROPER CONDUCT IN BUSINESS MATTERS

1. Competition and antitrust laws

We act in the market as fair and responsible competitors and are fully committed to complying with applicable competition and antitrust laws. All of Hälssen & Lyon's business activities are based on the highest standards of integrity.

Hälssen & Lyon and its employees do not participate in any arrangements or agreements with other companies that have the purpose or effect of restricting or preventing competition in violation of competition or antitrust laws. We have a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement.

2. Avoidance of conflicts of interest, corruption and bribery

In their dealings with business partners, government and other institutions, all Hälssen & Lyon employees are required to keep the interests of the company and private interests strictly apart. Business actions and decisions must always be made free of extraneous considerations and personal interests in order to avoid any conflicts of interest or even the appearance of a conflict of interest. The aim is to avoid situations that could reduce the ability of the employee or that of the other parties involved to make unbiased commercial or business-related decisions.

As a matter of principle, benefits of value, as possible inducements, may not be offered, accepted, promised or granted. This applies in particular to advantages that improperly influence a business relationship or where there is a risk of jeopardising the professional

independence and integrity of business partners. It is important that no conflicts of interest or the appearance of conflicts of interest with business-related tasks or duties arise from the granting of benefits.

Gifts, dinner invitations or donations without a business background - i.e. in a clearly private context, to maintain friendships - are permitted.

Of course, business relationships also include gifts and attentions. The threshold for gifts, such as event-related presents, invitations to events, business lunches or donations, is set by the following detailed regulations for Hälssen & Lyon employees for both giving and receiving.

Giving and receiving gifts by Hälssen & Lyon employees in the context of business relationships:

The following applies to all gifts: **A gift of any kind must not be given in expectation of a return, nor must it even appear that the attention is given in order to gain an undue advantage. This also applies to invitations.**

- **Occasion-related gifts**

Gifts which have a value of not more than € 30 (e.g. flowers, promotional gifts, wine or similar) may be granted or accepted without prior permission from the superior if they are socially appropriate and are granted no more than three times a year. Gifts must always be sent to the respective company address.

If gifts of a higher value are given by third parties, they may be accepted on behalf of Hälssen & Lyon. They then immediately become the property of Hälssen & Lyon and will not be the property of the employee of Hälssen & Lyon. The attention of the giver must be drawn to the fact that the gifts will become the property of Hälssen & Lyon and that the recipient cannot receive personal gifts with a value of more than € 30.

- **Monetary gifts**

The grant or acceptance of monetary or similar benefits is prohibited under any circumstances. This includes not only gifts in cash, but also vouchers and other personal advantages that can be used in a similar way to money. The value of the benefit is irrelevant. The giving or receiving of monetary or similar advantages even of very low value is inadmissible.

- **Invitations to events**

If Hälssen & Lyon employees take part in an event, travel and accommodation expenses are usually met by Hälssen & Lyon; only in exceptional cases may the costs be borne by third parties. In such cases, both the travel and accommodation/food must be socially adequate and not excessively luxurious. Accompaniment by a spouse or partner is allowed with the express permission of the management.

- **Business meals**

Business meals are permitted in a socially appropriate setting.

- **Officials**

Cooperation with public officials is particularly problematic from a legal point of view. It is therefore prohibited to offer, promise or grant personal advantages to a German public official or a public official of the European Union. This prohibition also includes personal advantages in favour of third parties. This includes in particular life partners, relatives, friends and other persons close to the public official. This includes both gifts

and invitations. Public officials are in particular civil servants, such as customs officers. A gift is only permissible if the employer of the official has approved it. Such employer permission must be obtained through management. Meal invitations to a German or European official are only allowed if the value of the food does not exceed € 50 and if prior to that an employer approval has been obtained.

The following applies to foreign officials: It is prohibited to offer, promise or grant a foreign official personal benefits in order to gain an advantage or to induce an action of the official. This prohibition also includes personal benefits in favour of third parties. This includes in particular life partners, relatives, friends and other persons close to the public official. It includes both gifts and invitations.

- **Donations**

Hälssen & Lyon participates in social and community life by making donations for charitable, social, cultural, sporting and scientific purposes to the extent customary in business. Hälssen & Lyon does neither directly nor indirectly make donations to political parties or party-affiliated foundations. The granting or acceptance of donations which give or could give the impression of undue influence on a customer, business partner or other third party is not permitted.

Basic principles:

- All gifts, invitations to events and business meals which exceed the above-mentioned value limits may not be accepted and must be submitted in advance to the competent superior for approval. Only if the benefit has been approved by way of an exception, may it be accepted.
- All gifts, invitations to events and business meals which exceed the above-mentioned value limits may not be granted. An exceptional grant of such benefits must be approved in advance by the competent superior in each individual case.
- If, despite these regulations, unclear situations and doubts arise, the employees of Hälssen & Lyon must actively inform their respective superior in advance in order to clarify the seeming or actual conflict.

3. Communication and confidentiality

All employees of Hälssen & Lyon are required to draw up business documents, records and representations precisely and with immaculate content. This is about communication that contributes to the impeccable reputation of the company.

Informing the public of any matters concerning the company (e.g. business development, promotions, new appointments or dismissals, etc) is the exclusive responsibility of the management. If the task is delegated, any information materials and information channels must be authorised in advance by management. The process in particular for crisis management and the role of the company spokesperson is regulated in the Quality Management manual (F06 PB01).

All Hälssen & Lyon employees are obliged to protect business secrets. Confidential information and documents must not be disclosed to third parties or made accessible in any other way, unless authorisation has been granted for this or the information is publicly available. This rule also applies to corresponding documents of all business partners.

The data collected, accumulated, processed, used and stored within the scope of business activities, which are required for the provision of services and regular business operations, must be protected against access by third parties or dissemination to unauthorised persons by means of suitable technologies and work processes and instructions.

Hälssen & Lyon undertakes to meet the reasonable expectations of clients, suppliers, customers and employees with regard to the protection of private and confidential information.

4. Data protection

The preservation of informational self-determination and the protection of privacy as well as the security of data processing are important concerns for us. For this reason, all necessary precautions must be taken to ensure that the collection, processing and use of the personal data provided to our company is transparent, purposeful, comprehensible, careful and in compliance with the applicable legal provisions of data protection laws. All Hälssen & Lyon employees who receive and process personal data must do so in compliance with all provisions of the GDPR.

All employees are obliged to ensure an appropriate standard of security in the processing of information so that the confidentiality, integrity and traceability of the information that needs to be protected are guaranteed and unauthorised use is prevented.

5. Money laundering and trade controls

We do not condone any activities related to money laundering. We carefully verify the identity of customers, service providers, consultants and other third parties with whom we do business or are going to do business.

We ensure, in compliance with national and international laws, that transactions with third parties do not violate trade regulations such as economic embargoes, import and export control requirements or applicable requirements to prevent the financing of terrorism.

III. RESPONSIBLE TREATMENT OF THE ENVIRONMENT – ECOLOGICAL RESPONSIBILITY

1. Environment and sustainability

In order to maintain the economic basis of our company in the medium and long term, it is also necessary to secure the availability of raw materials in the long term. Therefore, the principle of sustainability is a constant and lived component of the corporate strategy.

We understand environmental protection as our duty and are committed to the responsible and sustainable use of natural resources. Our actions in all our business areas, along the entire value chain and at all levels - from management to each individual employee - are geared towards sustainability.

2. Protection of the environment and resources

All Hälssen & Lyon employees are bound to comprehensive environmental protection and the sustainable use of natural resources. This means that all environmental laws and regulations applicable to the business must be complied with and the environmental impact associated with the daily work must be taken into account.

All employees of our company

- also consider environmentally friendly alternatives in all actions and decisions and
- strive to use scarce resources sparingly and contribute further work- and task-related suggestions for environmental protection and resource conservation in order to reduce or, ideally, completely avoid burdens on the environment.

3. Handling waste and hazardous substances

As a company, we follow a systematic approach to identifying, handling, reducing and responsibly disposing of or recycling waste.

In production, all employees are required to separate waste according to the specific types of waste.

In administration as well all employees separate the waste generated properly and in accordance with the available waste containers.

IV. COMPLIANCE WITH AND MONITORING OF THE CODE OF CONDUCT

A violation of the Code of Conduct may lead to disciplinary measures for all employees, i.e. including executives. For this reason, management of Hälssen & Lyon ensures that the principles and ethical values of this code are regularly communicated to all employees in an appropriate manner.

All supervisors with disciplinary responsibility have the task, in addition to their function as role models, of carrying the Code of Conduct into the company and of monitoring compliance with it. As part of his or her responsibility as an executive, every supervisor has to ensure that all employees in his area of responsibility take note of the rules of the Code and observe them.

Management is available to all employees as a point of contact on all matters regulated in the Code of Conduct.

Procedure in cases of doubt and violations of the rules

In the event of doubt or ambiguity as to how the Code of Conduct should be interpreted in individual cases, all employees must first contact their respective superiors. Before talking to the superior the employee should - as far as possible - clarify the actually intended, conceivable or already occurred facts that raise problems, so that the superior can assess a specific situation. In the event of continuing uncertainty, management must be consulted.

Any perceived infractions by the employee himself must be reported immediately to the relevant superior. Provided that the violation was not committed through gross negligence or intent, it is only a matter of correcting the mistake as quickly and effectively as possible and avoiding possible damage. If uncertainty persists or a violation is confirmed, management must be consulted.

Employees who notice a violation of the rules not committed by themselves are requested to first address the person responsible directly. If there still is suspicion of an infringement of the rules laid down in the Code of Conduct, every employee is encouraged to inform management. They will check the relevant information and initiate further measures. All information obtained in this way will be treated confidentially.

Management documents all advantages requiring approval as well as confirmed violations of the regulations. All communication about an authorisation of benefits, doubtful cases and rule violations takes place exclusively through the official channels of the company, e.g. in the case of e-mails via the company account, so that both sides and also the employee allegedly infringing the rules are informed about the process, but at the same time the confidentiality of the information is maintained.

In addition, it is possible as of May 2023 to use our digital whistleblower portal to report breaches of rules. By using the portal, the anonymity of the whistleblower is technically ensured.

V. REVIEW OF THE CONDUCT

The Code of Conduct is regularly reviewed by management to ensure that it is up to date, complete and efficacious.

VI. CONTACT

Your contact for all questions about our commitment to sustainability and compliance is:

Frank Braun
CSR Representative

Phone: +49 40 36 14 3-251
E-mail: fbraun@haelssen-lyon.com

HÄLSSSEN & LYON GMBH

Pickhuben 9
20457 Hamburg
Germany

Phone: +49 40 36 14 3-0
Fax: +49 40 36 14 3-117

info@haelssen-lyon.com
www.haelssen-lyon.com

HUMAN RIGHTS

Principle 1:



BUSINESSES
SHOULD SUPPORT AND RESPECT
THE PROTECTION
OF INTERNATIONALLY PROCLAIMED
HUMAN RIGHTS

Principle 2:



MAKE SURE THAT
THEY ARE NOT
COMPLICIT IN
HUMAN RIGHTS
ABUSES

LABOUR

Principle 3:

BUSINESSES SHOULD
UPHOLD THE
FREEDOM
OF ASSOCIATION AND THE
EFFECTIVE RECOGNITION OF

THE RIGHT TO
COLLECTIVE
BARGAINING



Principle 4:



THE ELIMINATION
OF ALL FORMS OF
FORCED
& COMPULSARY
LABOUR

Principle 5:



THE EFFECTIVE
ABOLITION OF
CHILD
LABOUR

Principle 6:



THE ELIMINATION OF
DISCRIMINATION
IN RESPECT OF
EMPLOYMENT &
OCCUPATION

ENVIRONMENT

Principle 7:



BUSINESSES SHOULD
SUPPORT
A PRECAUTIONARY
APPROACH TO
ENVIRONMENTAL
CHALLENGES

Principle 8:

UNDERTAKE
INITIATIVES
TO PROMOTE
GREATER
ENVIRONMENTAL
RESPONSIBILITY



Principle 9:



ENCOURAGE THE
DEVELOPMENT
AND DIFFUSION OF
ENVIRONMENTALLY
FRIENDLY
TECHNOLOGIES

ANTI-CORRUPTION

Principle 10:



BUSINESSES SHOULD WORK
AGAINST CORRUPTION
IN ALL ITS FORMS, INCLUDING
EXTORTION AND BRIBERY

